

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re: Kimberly Vanessa Bracey AKA Kim	:	Case No. 5:18-bk-00568-RNO
Vanessa Bracey, AKA Kimberly V.	:	
Bracey, AKA Kim Bracey, AKA	:	Chapter 13
Kimberly Bracey, AKA Kim V. Bracey,	:	
Debtor.	:	

Wells Fargo Bank, N.A., d/b/a Wells	:	
Fargo Auto,	:	
Movant,	:	Motion for
v.	:	Relief from Stay
Kimberly Vanessa Bracey AKA Kim	:	
Vanessa Bracey, AKA Kimberly V.	:	
Bracey, AKA Kim Bracey, AKA	:	
Kimberly Bracey, AKA Kim V. Bracey	:	
Abdullah Frazier, and	:	
	:	
Charles J. DeHart, III, Trustee,	:	
Respondents.	:	

ANSWER TO MOTION OF
WELLS FARGO BANK, N.A. FOR RELIEF FROM STAY

AND NOW COMES Debtor, Kimberly Bracey, by and through her attorneys, Newman,
Williams, P.C. and in Answer to the Motion of Wells Fargo Bank for Relief from Stay avers:

1. Admitted.
2. Denied. After reasonable investigation the Debtor is without knowledge sufficient to form a belief as to the truth of this averment and therefore the averment is denied.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.

9. Admitted.

10. Denied. Debtor reasonably believes the amount due is less.

11. Denied. Debtor reasonably believes the amount due is less.

12. Denied to the extent the averments of paragraph 12 are anything other than a statement or conclusion of law or request for relief that does not require a response.

13. Denied to the extent the averments of paragraph 13 are anything other than a statement or conclusion of law or request for relief that does not require a response.

14. Denied to the extent the averments of paragraph 14 are anything other than a statement or conclusion of law or request for relief that does not require a response.

15. Denied to the extent the averments of paragraph 15 are anything other than a statement or conclusion of law or request for relief that does not require a response.

16. Denied to the extent the averments of paragraph 16 are anything other than a statement or conclusion of law or request for relief that does not require a response.

WHEREFORE, Debtor, Kimberly Bracey, respectfully prays this Honorable Court for an Order that the Motion of Wells Fargo Bank for Relief from Stay be denied and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN WILLIAMS, P.C.

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